

State of California

## Respiratory Care Board

Consumer Affairs

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## Inquiry:

Our Respiratory Therapy Department is getting ready to open a new position. The position will be titled "Respiratory Therapy Technical Partner (RTTP)". If we use the wording, Respiratory Therapy, will the individual need to be licensed?

This position will not require a license. If I need to take the wording out, then I will revise the title.

The Respiratory Therapy Technical Partner will be responsible for the following:

- 1. Transport E and H O2 cylinders
- 2. Handle O2 equipment and stock floors
- 3. Cleaning and cold disinfection of non-deposable respiratory equipment
- 4. Cleaning and cold disinfection of bronchoscopes
- 5. Performing and documenting safety checks on O2 flow meters
- 6. Document O2 usage on O2 log flow sheet
- 7. Perform pulse oximetry and log results
- 8. Document patient's O2 usage or non-usage
- 9. Perform safety checks on pulse oximetry monitors.
- Perform oxygen rounds and document O2 flow rates only.

At no time will the RTTP make changes on continuous patient oxygen usage or provide pt. care

## Response:

I have reviewed the functions you will potentially be asking this new position to perform at your facility and have the following comments:

Many of the duties you will be asking this employee to perform concern the safe handling of medical gases, medical gas delivery devices and their storage. It also includes the cleaning and disinfection of respiratory equipment and bronchoscopes. It is therefore imperative that appropriate training be conducted and competencies observed in order to ensure patient safety is maintained.

There are two functions you are including as duties of these technical partners that require more than simply logging the results. Those functions are oximetry and oxygen rounds. These functions have the potential to cause harm when non-licensed personnel collect data or perform a function in which clinical decisions will be made by licensed professionals. There is also the issue of timely reporting of abnormal readings of oximetry and or patients found off oxygen when they have been ordered to have oxygen administered. You clearly cannot have the technical partner re-apply the oxygen or act upon a low oxygen saturation because they are not trained or licensed to perform such a function. The functions as they stand by themselves are not a direct violation of the Practice Act; however the unintended risks to the patient may outweigh the potential benefits you may have envisioned by having these function performed by a non-licensed position.



This determination does not constitute a declaratory decision under the comprehensive provisions of the Government Code sections 11465.10 – 11465.70.